



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

DEC 18 2014

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Frank B. Perry  
Director, Health, Safety & Environmental  
Columbia Pipeline Group  
1700 MacCorkle Avenue, SE  
Charleston, WV 25314

Dear Mr. Perry:

Thank you for your letter dated July 28, 2014, in which you request modification to the sampling and analysis requirements of 40 CFR §761.30(i)(1)(iii)(A) for Columbia Gas Transmission. Specifically, you request that the U.S. Environmental Protection Agency approve Columbia's use of alternative methods and locations to characterize its natural gas pipeline system when organic liquids are not present to test for polychlorinated biphenyls.

In 40 CFR §761.30(i)(1)(iii)(D), the Director, National Program Chemicals Division is authorized to modify the requirements of 40 CFR §761.30(i)(1)(iii)(A), including requirements for sampling and analysis, based on a finding of no unreasonable risk. Such modifications will be based on the natural gas pipeline size, configuration, and current operating conditions, among other considerations listed in the regulations.

According to your letter and subsequent discussions with your staff, Columbia's natural gas pipeline system is generally dry (i.e., does not contain organic liquids) and, therefore, existing condensate collection points tend to be dry, leaving you with no or insufficient liquid to test for PCBs. You also note that your system is a closed system and therefore the interior surfaces of major transmission pipes are not readily accessible for standard wipe sampling due to operating conditions; in most cases sampling such surfaces would require taking a section of pipeline out of service, and also involve excavation and cutting to access the pipe. Smaller ancillary pipes, such as meter-runs, do provide accessible interior surfaces which can be sampled without disrupting service. However, due to their smaller diameter, sampling these pipes may require use of alternative wipe sampling methods to the standard wipe test as defined at 40 CFR §761.123.

Based on this information, I hereby grant Columbia a modification of 40 CFR §761.30(i)(1)(iii)(A) to allow the use of wipe sampling to characterize the extent of PCB contamination in its natural gas pipeline system, subject to the following conditions:

- If organic liquids are present in sufficient quantity to collect a sample for analysis, you must use those liquids to characterize your system instead of a wipe sample.
- Samples may be collected from locations other than existing condensate collection points (e.g., from accessible pipeline segments including meter-runs).

- If organic liquids are present in insufficient quantity to analyze, or only a residue is present, you will, whenever possible, collect wipe samples from an area including those surfaces where the liquid traces or residue is present.
- You must perform wipe sampling in accordance with 40 CFR §761.123, definition of standard wipe test, and 40 CFR §761.243, except as noted below.
- When  $<100 \text{ cm}^2$  of surface area eligible for sampling is present at a particular sampling site (e.g., when sampling a small diameter pipe, a small valve, or a small regulator), you may collect a sample from a smaller surface area and convert the measurement to the equivalent measurement for  $100 \text{ cm}^2$  for purposes of comparison to standards based on  $100 \text{ cm}^2$ . Laboratory detection levels must be adequate to support such conversions, (i.e., you may not use test results below the level of quantification to calculate a wipe sample result  $<10 \mu\text{g}/100 \text{ cm}^2$ ). In no instance may a surface area  $<25 \text{ cm}^2$  be used alone for wipe sampling.
- If use of a square template is not practical for a particular wipe sample, you may collect samples using a method other than a square template (e.g., a hexane swab attached to a cleaning rod may be used to swab small diameter pipe interiors).
- Wipe sample results will apply to the provisions of §761.30(i) in accordance with the PCB concentration levels specified by 40 CFR §761.1(b)(3) (i.e.,  $>10 \mu\text{g}/100 \text{ cm}^2$  will equal  $\geq 50$  ppm).
- As part of the records you maintain under 40 CFR §761.30(i)(1)(iii)(C), you must include records of all wipe samples performed under this modification, including location, methods, calculations and results.

Subject to these conditions, the use of this alternative method to characterize your system, in the absence of organic liquids, does not pose an unreasonable risk to human health and the environment. Note that this modification of the requirements of 40 CFR §761.30(i)(1)(iii)(A) granted to Columbia is subject to future amendment or revocation at the EPA's sole discretion.

If you have any further questions about this sampling modification, please contact Peter Gimlin of my staff at 202-566-0515 or [gimlin.peter@epa.gov](mailto:gimlin.peter@epa.gov).

Sincerely,



Tanya Hodge Mottley  
Director  
National Program Chemicals Division  
Office of Pollution Prevention and Toxics

cc: Region 2: Dore LaPosta, Director, DECA; Jim Haklar, PCB Coordinator  
Region 3: John Armstead, Director, LCD; Kelly Bunker, PCB Coordinator  
Region 5: Margaret Guerriero, Director, LCD; Peter Ramanauskas, PCB Coordinator





1700 MacCorkle Ave, SE  
Charleston, WV, 25314  
Phone: 304-357-2169  
Fax: 304-357-2644  
fperry@nisource.com

July 28, 2014

Tanya Mottley  
Director, National Program Chemicals Division  
US Environmental Protection Agency  
1200 Pennsylvania Avenue, NW (7404M)  
Washington, DC 20460

Re: Alternative PCB Sampling Method

Dear Ms. Mottley,

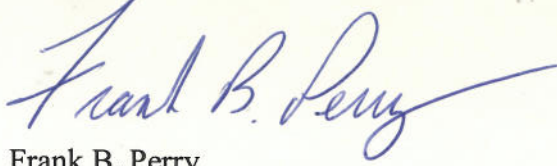
The purpose of this letter is to request EPA's approval for Columbia Gas Transmission (Columbia) to use wipe sampling to establish the upstream and downstream end points of the segments or components of Columbia's natural gas pipeline system that have been identified as containing or having the potential to contain PCBs of 50 ppm or greater in accordance with 40 CFR § 761.30(i). Persons characterizing the extent of PCB contamination in accordance with 40 CFR § 761.30(i)(1)(iii)(A)(2) must do so by "analyzing organic liquids collected at existing condensate collection points in the pipe or pipeline system... if no liquids are present, they must use standard wipe samples in accordance with subpart M of this part" 40 CFR § 761.30(i)(1)(iii)(E)(4). This requirement is a problem for Columbia because our pipeline system is generally dry and, therefore, our existing condensate collection points tend to be dry (i.e., we frequently have no organic liquid to test). Also our system is a closed system and not readily accessible for wipe sampling due to operational conditions. In most cases this would require blowing down a section of pipeline to collect an annual sample.

Pursuant to 40 CFR § 761.30(i)(1)(iii)(D), EPA may modify the sampling and analysis requirements of 40 CFR § 761.30(i)(1)(iii)(A). Columbia hereby requests that EPA authorize Columbia, where organic liquids are not available for sampling and the pipeline segment is accessible, to use wipe samples collected in accordance with subpart M 40 CFR § 761.243(b) for purposes of 40 CFR § 761.30(i)(1)(iii)(A)(2). Columbia further requests to collect a sample from a smaller surface area, when  $<100 \text{ cm}^2$  of surface eligible for sampling is present; e.g., when sampling a small diameter pipe, a small valve, or a small regulator. Columbia will convert the measurement to the equivalent measurement for  $100 \text{ cm}^2$  for the purposes of comparison to standards based on  $100 \text{ cm}^2$  when smaller surfaces are sampled. This request would be applicable to Columbia's operating territory which includes EPA Regions 2, 3, and 5.

Columbia's proposed alternative sampling method poses no unreasonable risk to the public. Wipe sampling is already an approved method for characterizing PCB contamination under Subpart M of the regulation. Thus, allowing Columbia to use wipe samples in lieu of organic liquid samples for compliance with 40 CFR § 761.30(i)(1)(iii)(A)(2) does not increase any risk to the public.

Should you have any questions or comments, please feel free to contact Heather Roberts at (724) 627-2112 or Pat Croghan at (304) 722-8695.

Sincerely,



Frank B. Perry  
Director, Health, Safety, & Environmental  
Columbia Pipeline Group



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

AUG 1 2008

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Michael L. Menne  
Vice President  
Environmental Services  
Ameren Services  
One Ameren Plaza  
1901 Chateau Avenue  
P.O. Box 66149  
St. Louis, MO 63166-6149

*mailed* →

AUG 13 2008

Dear Mr. Menne:

This letter is in response to your letter dated April 17, 2008, in which you request modification to the sampling and analysis requirements of 40 CFR 761.30(i)(1)(iii)(A). You request the use of a wipe sampling method where organic liquids are not available to characterize your natural gas pipeline system.

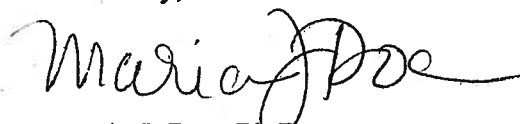
40 CFR 761.30(i)(1)(D) allows the Director, National Program Chemicals Division, to modify the requirements of 40 CFR 761.30(i)(1)(iii)(A), based on a finding of no unreasonable risk. These requirements may be modified based on the natural gas pipeline system size, configuration, and current operating conditions, among other things.

You indicate that your natural gas pipeline system is often dry (i.e., does not contain organic liquids for testing). You also indicate that you routinely excavate and open the pipelines as part of your day-to-day operations and maintenance.

Based on the information provided in your letter, I hereby grant you a modification of 40 CFR 761.30(i)(1)(iii)(A)(5) to allow the use of a wipe sampling method, in accordance with 40 CFR 761.123 and Subpart M, to sample your natural gas pipeline system, when no organic liquids are present. If organic liquids are present, you must use those liquids to characterize your system instead of a wipe sample. The use of a wipe sample to characterize your system, in the absence of organic liquids, does not pose an unreasonable risk to human health and the environment.

We appreciate your vigilance in characterizing your natural gas pipeline system.  
If you have any further questions, please contact Sara McGurk at (202) 566-0480.

Sincerely,

A handwritten signature in black ink, appearing to read "Maria J. Doa". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Maria J. Doa, Ph.D.

Director

National Program Chemicals Division

cc: Tony Martig, Region 5  
Mazzie Talley, Region 7



*Ameren Services*

*Environmental Services  
314.554.2816 (Phone)  
314.554.4182 (Facsimile)  
mlmenne@ameren.com*

One Ameren Plaza  
1901 Chouteau Avenue  
PO Box 66149  
St. Louis, MO 63166-6149  
314.621.3222

April 17, 2008

Maria J. Doa, Ph.D.  
US Environmental Protection Agency  
1200 Pennsylvania Avenue, NW (7404T)  
Room 4353-HH  
Washington, DC 20460



RE: Alternative PCB Sampling Method

Dear Ms. Doa:

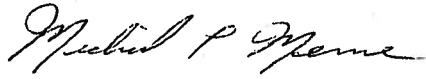
The purpose of this letter is to request USEPA's approval for AmerenCIPS, AmerenIP, and AmerenCILCO (collectively, "Ameren") to use wipe sampling to comply with the PCB Use Authorization set forth in 40 CFR §761.30. Persons characterizing PCB contamination in natural gas pipeline systems under this rule must do so by "analyzing organic liquids". This requirement presents a problem for Ameren, because our natural gas pipeline systems are generally dry so our existing condensate collection points tend to be dry as well (i.e., we frequently have no organic liquids to test.), and the configuration of our natural gas pipeline systems do not provide us with many opportunities to encounter organic liquids (very few liquid collection devices currently exist).

Pursuant to 40 CFR §761.30(i)(1)(iii)(D), the USEPA's Director, National Program Chemicals Division, may modify the sampling and analysis requirements of 40 CFR §761.30(i)(1)(iii)(A). Ameren hereby requests that USEPA authorize Ameren, where organic liquid is not available for sampling, to use wipe samples for purposes of meeting the requirements of 40 CFR §761.30(i)(1)(iii)(A).

Ameren regularly excavates and opens its natural gas pipelines as part of its day to day operations and maintenance, and wipe sampling is already being used by Ameren for characterizing PCB contamination in pipe segments under Subpart M of the regulation. Thus, allowing Ameren to expand the use of wipe samples in lieu of organic liquid samples for meeting the requirements of the PCB Use Authorization testing does not present an increased risk to the public. Such a determination was recently made for KeySpan Corporation; see the attached letter.

Should you have any questions or comments, please feel free to contact me at 314-554-2816. I look forward to your response.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael L. Menne".

Michael L. Menne, Vice President  
Environmental Services

Attachment

cc: Tony Martig, USEPA  
USEPA Region 5  
77 West Jackson Boulevard  
Mail Code: LC-8J  
Chicago, IL 60604-3507





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

APR 27 2006

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Wei H. Chang  
KeySpan Corporation  
175 East Old Country Road  
Hicksville, New York 11801-4280

Dear Mr. Chang:

This letter is in response to your letter dated April 6, 2006, in which you request modification to the sampling and analysis requirements of 40 CFR 761.30(i)(1)(iii)(A). You request the use of a wipe sampling method where organic liquids are not available to characterize your natural gas pipeline system.

40 CFR 761.30(i)(1)(D) allows the Director, National Program Chemicals Division, to modify the requirements of 40 CFR 761.30(i)(1)(iii)(A), based on a finding of no unreasonable risk. These requirements may be modified based on the natural gas pipeline system size, configuration, and current operating conditions, among other things.

You indicate that your natural gas pipeline system is often dry (i.e., does not contain organic liquids for testing). You also indicate that you routinely excavate and open the pipelines as part of your day-to-day operations and maintenance.

Based on the information provided in your letter, I hereby grant you a modification of 40 CFR 761.30(i)(1)(iii)(A)(5) to allow the use of a wipe sampling method, in accordance with 40 CFR 761.123 and Subpart M, to sample your natural gas pipeline system, when no organic liquids are present. If organic liquids are present, you must use those liquids to characterize your system instead of a wipe sample. The use of a wipe sample to characterize your system, in the absence of organic liquids, does not pose an unreasonable risk to human health and the environment.

We appreciate your vigilance in characterizing your natural gas pipeline system.  
If you have any further questions, please contact Sara McGurk at (202) 566-0480.

Sincerely,

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Maria J. Doa, Ph.D.

Director

National Program Chemicals Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

APR 27 2006

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PREVENTION, PESTICIDES AND  
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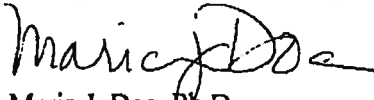
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You indicate that your natural gas pipeline system is often dry (i.e., does not contain organic liquids for testing). You also indicate that you routinely excavate and open the pipelines as part of your day-to-day operations and maintenance.

Based on the information provided in your letter, I hereby grant you a modification of 40 CFR 761.30(i)(1)(iii)(A)(5) to allow the use of a wipe sampling method, in accordance with 40 CFR 761.123 and Subpart M, to sample your natural gas pipeline system, when no organic liquids are present. If organic liquids are present, you must use those liquids to characterize your system instead of a wipe sample. The use of a wipe sample to characterize your system, in the absence of organic liquids, does not pose an unreasonable risk to human health and the environment.

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Maria J. Doa, Ph.D.

Director

National Program Chemicals Division



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 27 2006

Wei H. Chang  
KeySpan Corporation  
175 East Old Country Road  
Hicksville, New York 11801-4280

Dear Mr. Chang:

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40 CFR 761.30(i)(1)(D) allows the Director, National Program Chemicals Division, to modify the requirements of 40 CFR 761.30(i)(1)(iii)(A), based on a finding of no unreasonable risk. These requirements may be modified based on the natural gas pipeline system size, configuration, and current operating conditions, among other things.

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Based on the information provided in your letter, I hereby grant you a modification of 40 CFR 761.30(i)(1)(iii)(A)(5) to allow the use of a wipe sampling method, in accordance with 40 CFR 761.123 and Subpart M, to sample your natural gas pipeline system, when no organic liquids are present. If organic liquids are present, you must use those liquids to characterize your system instead of a wipe sample. The use of a wipe sample to characterize your system, in the absence of organic liquids, does not pose an unreasonable risk to human health and the environment.

## CONCURRENCES

SYMBOL	7404T	7404T						
SURNAME	M. Gurr	Doc						
DATE	4/27/06	4/27/06						

We appreciate your vigilance in characterizing your natural gas pipeline system.  
If you have any further questions, please contact Sara McGurk at (202) 566-0480.

Sincerely,

Maria J. Doa, Ph.D.  
Director  
National Program Chemicals Division



  
KeySpan Corporation  
175 East Old Country Road  
Hicksville, New York 11801-4280

April 06, 2006

Maria J. Doa, Ph.D.  
US Environmental Protection Agency  
1200 Pennsylvania Avenue, NW (7404T)  
Room 4353-HH  
Washington, DC 20460

RE: Alternative PCB Sampling Method

Dear Ms. Doa:

The purpose of this letter is to request EPA's approval for KeySpan to use wipe sampling to comply with the PCB Use Authorization provisions set forth in 40 CFR §761.30(i). Persons characterizing PCB contamination under this regulation must do so by "analyzing organic liquids collected at existing condensate collection points in the pipe or pipeline system." 40 CFR §761.30(i)(1)(iii)(E)(4). This requirement is a problem for KeySpan because our pipeline system is generally dry and, therefore, our existing condensate collection points tend to be dry (i.e., we frequently have no oil to test).

Pursuant to 40 CFR §761.30(i)(1)(iii)(D), EPA may modify the sampling and analysis requirements of 40 CFR §761.30(i)(1)(iii)(A). KeySpan hereby requests that EPA authorize KeySpan, where organic liquid is not available for sampling, to use wipe samples at or near purchase points or interconnection points for purposes of meeting the requirements of 40 CFR §761.30(i)(1)(iii)(A). KeySpan's proposed alternate sampling method poses no unreasonable risk to the public. KeySpan regularly excavates and opens its pipelines as part of its day-to-day operations and maintenance and wipe sampling is already an approved method for characterizing PCB contamination under Subpart M of the regulation. Thus, allowing KeySpan to use wipe samples in lieu of oily liquid samples for PCB Use Authorization testing does not increase any risks to the public.

Should you have any questions or comments, please feel free to contact me at (516) 545-4368. I look forward to your response.

Sincerely,

  
Wei H. Chiang

cc: M. Bruscella  
M. Casey  
F. Murphy  
A. Taft  
R. Wilson